

Before the
Federal Communications Commission
Washington, DC 20554

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In the Matter of)	MM Docket No. 99-25
)	
Creation of a Low)	RM-9208
Power Radio Service)	RM-9242

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Comments of the Intercollegiate Broadcasting System, Inc. (IBS)

General

1. Founded in 1940, IBS is a nonprofit, educational, nationwide association of school and college radio stations. We provide educational and informational materials and services to both existing stations and those that seek to get on the air.
2. The founders of IBS were active as original advocates for the establishment of the reserved portion of the FM band (88.1 – 91.9 MHz). Throughout the years, IBS has filed comments on a wide range of issues of concern to noncommercial, educational broadcasters. IBS was especially active regarding Class D FM stations, although the large majority of our member-stations now operate with Class A or higher facilities.
3. When Docket 20735 raised the minimum noncommercial educational FM broadcast application to Class A or above, it effectively eliminated an entry level option (Class D) from which many stations had traditionally grown and developed.
4. In many ways, IBS sees the Commission's LPFM proposals as a rediscovery of the value of low-powered FM stations and their inherent ability to provide diversity in serving local communities.

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Proposed Service

5. IBS supports the establishment of a noncommercial, microradio service, only within the reserved portion (88.1 – 91.9 MHz) of the FM broadcast band.
6. This should effectively limit opposition of commercial FM broadcasters and provide a means of practical applications within a band whose listeners have learned to expect diversity. As for anticipated opposition from National Public Radio (NPR) and its affiliates, it is difficult to agree with financial concerns they may have with these new microradio stations. NPR stations currently operate with budgets generally exceeding \$100,000 per year and these new stations are likely to operate on a miniscule fraction of that amount. If they pose a listenership threat to the existing stations, perhaps it is further justification for the need to establish this new service.

Power

7. IBS is proposing these noncommercial microradio stations be limited in power output to the range from 1 – 100 watts. From 101 watts up, there are already existing avenues for new noncommercial FM broadcasters. However, at present, there are no existing opportunities for new microradio stations in the 1 – 100 watt range.

Interference Protection

8. These new microradio stations would be required to protect each other, existing Class D or higher stations, but not FM translators. Microradio stations would receive protection from other microradio stations, existing Class D stations and translators. This protection is similar to the current status of existing Class D stations.

Ownership

9. To foster diversity in ownership, IBS proposes that these new microradio stations be limited to 1 per owner, with the owner required to maintain its principal office and residence within a 35 mile radius from the station.
10. Existing licensees would be excluded from ownership of these new microradio stations, except for educational institutions with existing Class A or higher stations, which would be allowed 1 microradio station per campus.
11. Note: Existing Class D stations would not be precluded from applying for a change to microradio station status and an increase from their present power to a maximum of 100 watts, presuming adequate spectrum space is available.
12. In recognition of past service, preferences should be given for existing Class D FM stations, closed-circuit, carrier-current, cable and other limited area broadcasters based a track record of campus/community service.

Locally-originated Programming

13. In order to encourage locally-based programming, IBS proposes a requirement for local program origination at a minimum of 51% per week. We do not want to see this new service become an extension of existing national services, but to become a voice for local communities.

Reasons for Support

14. The Commission itself has defined the most important reasons for establishment of this new service: it would provide easier access for disenfranchised voices and a truly local service. This is even more true for microradio stations than for the higher-powered LPFM stations also proposed by the Commission.
15. This new service would be a noncommercial service only, and would not compete with commercial stations for spectrum space or advertising revenues.

16. It would fill an existing gap: there are presently no opportunities for new FM stations with proposed power of less than 100 watts. This new low-power category allows more possibilities for new stations in a range in which no new applications are now being considered.

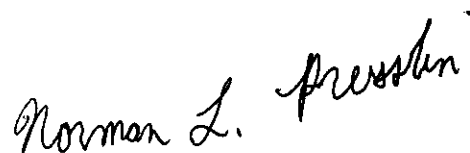
Summary

17. In summary, IBS agrees with the Commission on the need for this new service, under the proposed limitations to protect existing stations while providing a way for new noncommercial stations to operate on the air, legally, and for new voices to be heard.

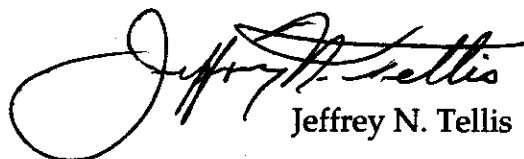
Respectfully submitted,



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